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December 7, 2016

MEMO ENDORSED

OK

Colleen McMahon
12/12/16

BY ECF FILING AND HAND DELIVERY

The Honorable Colleen McMahon
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: West et al. v. City of New York et al.,
16 CV 2299 (CM) (BCM)
Joint Request to Stay Discovery

Honorable Judge McMahon:

The letter constitutes a joint application by Plaintiffs and Defendants for a 60-day stay of discovery until **February 3, 2017** while the parties negotiate a settlement of this matter.

Recently, the parties have engaged in good-faith settlement negotiations, and now believe that an amicable resolution of this action is imminent. A 60-day stay of discovery to complete the parties' negotiations is thus warranted at this time to prevent the expenditure of resources on the continued search, review, and production of thousands of documents in accordance with the upcoming deadlines set forth in the Order of Magistrate Judge Barbara C. Moses dated November 9, 2016 (the "November 9 Order"). *See* Docket No. 37, ¶ 2. In addition, a stay is warranted to avoid use of the parties' resources in preparing, conducting and participating in the depositions of the individual named Plaintiffs, which must take place by December 31, 2016 in accordance with the case management plan. *See* Docket No. 20, ¶ 6.

This joint request constitutes the parties' first request for a stay of discovery. Other than the aforementioned deadlines set forth in the November 9 Order and the case management plan, there are no other scheduled dates in this matter affected by the parties' joint request.

Thank you for your consideration.

Sincerely yours,

/s/
Pamela A. Koplik

/s/
C.K. Lee, Esq.